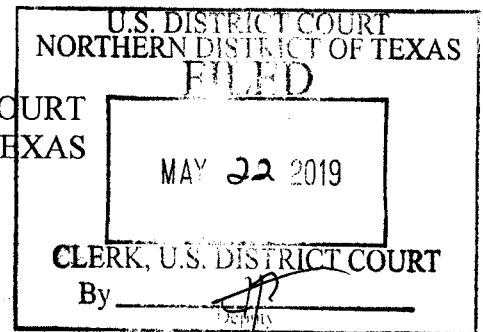


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

NO.

v.

SHON GREENWOOD
DAWN GREENWOOD

3-19CR-262-N

INDICTMENT

The Grand Jury Charges:

Count One
Production of Child Pornography
(Violation of 18 U.S.C. § 2251(a))

On or about December 16, 2018, in the Dallas Division of the Northern District of Texas, the defendant, **Shon Greenwood**, did knowingly use, persuade, induce, and entice a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant used his cell phone to create a visual depiction of Jane Doe, a minor who was then 9-years-old, depicting the defendant penetrating the mouth of Jane Doe with his penis.

In violation of 18 U.S.C. § 2251(a), the penalty for which is found at 18 U.S.C. § 2251(e).

Count Two
Production of Child Pornography
(Violation of 18 U.S.C. § 2251(a))

On or about December 16, 2018, in the Dallas Division of the Northern District of Texas, the defendants, **Shon Greenwood** and **Dawn Greenwood**, did knowingly use, persuade, induce, and entice a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendants used a cell phone to create a visual depiction of Jane Doe, a minor who was then 9-years-old, depicting **Dawn Greenwood** pushing Jane Doe's head down on **Shon Greenwood's** penis.

In violation of 18 U.S.C. § 2251(a), the penalty for which is found at 18 U.S.C. § 2251(e).

Count Three
Transporting and Shipping Child Pornography
(Violation of 18 U.S.C. § 2252A(a)(1))

On or about October 31, 2018, in the Dallas Division of the Northern District of Texas, the defendant, **Shon Greenwood**, did knowingly transport and ship child pornography using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer. Specifically, the defendant physically transported images and videos of child pornography as defined in 18 U.S.C. § 2256, from Missouri to Texas, including the following described videos:

File name:	Description:
2018-09-12 18.26.17	A video file depicting a male penetrating the mouth of a minor female child.
2018-09-12 19.39.51	An image file depicting a minor female child, who has on green underwear that is pulled aside by another person's finger thereby exposing her genitals. She is also touching her genitals with her hand.

In violation of 18 U.S.C. § 2252A(a)(1), the penalty for which is found at 18 U.S.C. § 2252A(b)(1).

Count Four
Transporting and Shipping Child Pornography
(Violation of 18 U.S.C. § 2252A(a)(1))

On or about December 28, 2018, in the Dallas Division of the Northern District of Texas, the defendant, **Shon Greenwood**, did knowingly transport and ship child pornography using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer. Specifically, the defendant used a publicly available website and the Internet to send and transmit files of minors engaged in sexually explicit conduct and the lewd and lascivious exhibition of the genitals of minors, as defined in 18 U.S.C. § 2256, including the following described video:

File Name:	Description:
b91db122-6373-4696-8483-de0d05e7ed0b.mp4	Video depicting a nude minor female holding her breast, who then pulls open her genitals with her hands and bends over exposing her genitals.

In violation of 18 U.S.C. § 2252A(a)(1), the penalty for which is found at 18 U.S.C. § 2252A(b)(1).

Count Five
Transporting and Shipping Child Pornography
(Violation of 18 U.S.C. § 2252A(a)(1))

On or about December 14, 2018, in the Dallas Division of the Northern District of Texas, the defendant, **Dawn Greenwood**, did knowingly transport and ship child pornography using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer. Specifically, the defendant physically transported videos of child pornography as defined in 18 U.S.C. § 2256, from Missouri to Texas, including the following described video:

File name:	Description:
received(1).mp4	A video file depicting a nude minor female in a bathtub. A male is penetrating her mouth with his penis.

In violation of 18 U.S.C. § 2252A(a)(1), the penalty for which is found at 18 U.S.C. § 2252A(b)(1).

Forfeiture Notice
(18 U.S.C. § 2253)

Upon conviction of any of the offenses alleged in Counts One through Four, and pursuant to 18 U.S.C. § 2253(a), the defendants, **Shon Greenwood** and **Dawn Greenwood**, shall forfeit to the United States of America (a) any visual depiction described in 18 U.S.C. § 2251 and 2252A, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in the respective offense; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the respective offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of the respective offense and any property traceable to such property.

The above-referenced property subject to forfeiture from the previously-mentioned defendant includes, but is not limited to, any interest in the following:

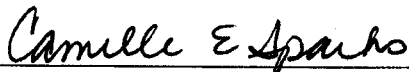
1. One LG GSM Stylo 4, Model: LM-Q710(FGN), IMEI: 356694093164549;
2. One LG GSM Aristo 2, Model: LM-X210MA, Android ID: bc0bec53f3749ec7; and
3. One ZTE GSM Z835 Maven 3, Android ID: 7483ac26f51a832c.

A TRUE BILL:



FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



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Assistant United States Attorney
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

SHON GREENWOOD
DAWN GREENWOOD

INDICTMENT

18 U.S.C. §§ 2251(a) and (e)
Production of Child Pornography
(Counts 1 and 2)

18 U.S.C. § 2252A(a)(1)
Transporting and Shipping Child Pornography
(Counts 3-5)

18 U.S.C. § 2253
Forfeiture Notice

5 Counts

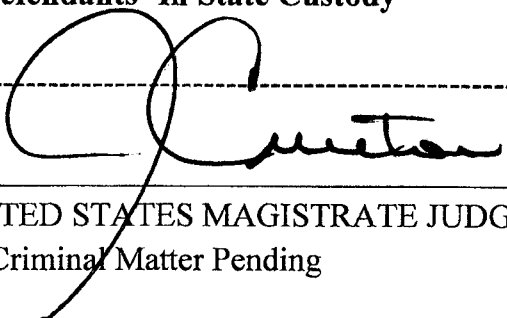
A true bill rendered

FORT WORTH


FOREPERSON

Filed in open court this 22nd day of May, 2019.

Warrant to be Issued for all Defendants- In State Custody


UNITED STATES MAGISTRATE JUDGE
No Criminal Matter Pending